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January 3, 2024

VIA ECF

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Martinez v. 189 Chrystie Street Partners, LP d/b/a The Box et al.*
Civil Case No.: 1:22-cv-03111-VEC

Dear Judge Caproni:

We represent Defendants in the above-referenced action. We submit this joint letter on behalf of all parties in accordance with Your Honor's So-Ordered Civil Case Management Plan and Scheduling Order ("Scheduling Order"), ordering the parties to jointly file monthly updates on the status of discovery. (Dkt. No. 90).

The parties have exchanged initial disclosures pursuant to FRCP 26(a)(1) by the deadline set forth in the Scheduling Order. On December 4, 2023, Defendants served their First Set of Interrogatories and First Request for Production of Documents on Plaintiff. On December 19, 2023 and January 2, 2024, Plaintiff provided HIPAA authorizations. Also on January 2, Plaintiff served her First Set of Interrogatories and Document Demands on Defendants.

Defendants consented to Plaintiff's request for a three-week extension of time to respond to Defendants' discovery demands through and including January 24, 2024. Defendants' responses to Plaintiff's First Set of Interrogatories and First Request for Production of Documents are due on February 1, 2024.

The parties will provide another status update on Thursday, February 1, 2024. We thank the Court for its time and attention to this matter.

The Honorable Valerie E. Caproni

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Respectfully,

/s/ Joan Lopez

Joan Lopez of
LEWIS BRISBOIS BISGAARD & SMITH LLP

Respectfully,

/s/ Megan S. Goddard

Megan S. Goddard of
GODDARD LAW PLLC